

1 MELINDA HAAG (CABN 132612)
United States Attorney

2 MIRANDA KANE (CABN 150630)
3 Chief, Criminal Division

4 DANIEL R. KALEBA (CABN 223789)
Assistant United States Attorney

E-FILED - 1/9/13

5 150 Almaden Boulevard, Suite 900
6 San Jose, CA 95113
Telephone: (408) 535-5061
7 Fax: (408) 535-5066
E-Mail: daniel.kaleba@usdoj.gov

8 Attorneys for the United States of America

9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION
12

13 UNITED STATES OF AMERICA,)
14 Plaintiff,)
15 v.)
16 MUHAMMAD OUSSAMA SAFADI, and)
17 SCOTT GHAISS SAFADI,)
18 Defendants.)

Nos. CR 12-00465 DLJ

STIPULATION AND ORDER TO
CONTINUE STATUS APPEARANCE
AND EXCLUDE TIME FROM JANUARY
10, 2013 TO FEBRUARY 7, 2013

19
20 Muhammad Safadi and Scott Safadi are scheduled to appear before this Court on
21 Thursday, January 10, 2013 for a further status. The parties jointly request additional time from
22 the Court to allow the defense to review discovery, and to further meet and confer concerning
23 discovery and case management. The parties request to appear before this Court on February 7,
24 2013 at 9:00 a.m. for a further status. The parties also jointly request that time be excluded
25 under the Speedy Trial Act for adequate preparation and continuity of counsel. 18 U.S.C. §
26 3161(h)(7)(A) and (B)(iv).

27 //

28 //

STIPULATION

1 Dated: January 9, 2013

Respectfully submitted,

2 MELINDA HAAG
3 United States Attorney

4 /s/
5 DANIEL R. KALEBA
6 Assistant United States Attorney

7 Dated: January 9, 2013

8 /s/
9 PAUL MELTZER
10 Attorney for Scott Safadi

11 Dated: January 9, 2013

12 /s/
13 KENNETH ROBINSON
14 Attorney for Muhammad Safadi

15 Based upon the representation of counsel and for good cause shown, the Court grants the
16 requested continuance and finds that failing to exclude the time between January 10, 2013 and
17 February 7, 2013 would unreasonably deny the defendant continuity of counsel and would deny
18 counsel the reasonable time necessary for effective preparation, taking into account the exercise
19 of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice
20 served by excluding the time between January 10, 2013 and February 7, 2013 from computation
21 under the Speedy Trial Act outweigh the best interests of the public and the defendant in a
22 speedy trial. Therefore, IT IS HEREBY ORDERED that the time between January 10, 2013 and
23 February 7, 2013 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §
24 3161(h)(7)(A) and (B)(iv).

25 Dated: 1/9/13

26 
27 HON. D. LOWELL JENSEN
28 United States District Judge